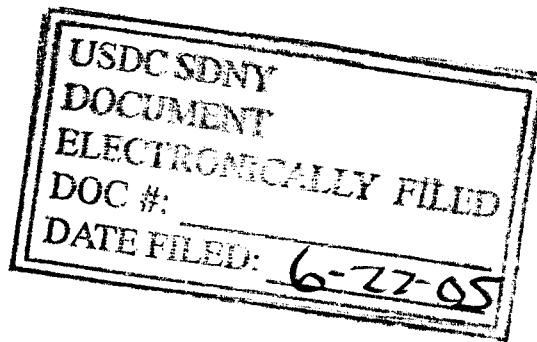


MQ  
Donald A. Klein (DK7821)  
SCHIFF HARDIN LLP  
623 Fifth Avenue  
New York, New York 10022  
212-753-5000  
Attorneys for Defendants  
Schreiber & Zindel,  
Frank Zindel, Engelbert Schreiber,  
and Engelbert Schreiber, Jr.



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:*

*Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076  
(RCC) (S.D.N.Y.)*

*Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC)  
(S.D.N.Y.)*

**NOTICE OF MOTION FOR ADMISSION PRO HAC VICE**

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Donald A. Klein dated June 10, 2005 and the exhibits annexed thereto, and upon all prior papers and proceedings, Defendants Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants") will move this Court on a date to be determined, upon submission, unless otherwise ordered by the Court, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, for an order permitting John N. Scholnick and Ayad P. Jacob of the law firm of Schiff Hardin LLP, Chicago, Illinois, counsel

for Defendants, to practice before this Court in connection with all proceedings in these matters.

Dated: New York, New York  
June 10, 2005

**APPLICATION GRANTED**

Richard Conway  
HON. RICHARD CONWAY CASEY 622-05

Donald A. Klein

Donald A. Klein (DK7821)

SCHIFF HARDIN LLP

623 Fifth Avenue

New York, New York 10022

212-753-5000

Attorneys for Defendants

Schreiber & Zindel,

Frank Zindel, Engelbert Schreiber,

and Engelbert Schreiber, Jr.

NY\5038394.1

Donald A. Klein (DK7821)  
SCHIFF HARDIN LLP  
623 Fifth Avenue  
New York, New York 10022  
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Attorneys for Defendants  
Schreiber & Zindel,  
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(S.D.N.Y.)*

**DECLARATION IN SUPPORT OF  
APPLICATION FOR ADMISSION PRO HAC VICE**

Donald A. Klein declares as follows:

1. I am a member in good standing of the Bar of the State of New York and of this Court, and I am of counsel to Schiff Hardin LLP, counsel for Defendants Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants"). I submit this declaration in support of Defendants' Motion for an order permitting John N. Scholnick and Ayad P. Jacob to practice before this Court in connection with all proceedings in these matters.

2. Plaintiffs' counsel has consented to this application.

3. Mr. Scholnick is a member of Schiff Hardin LLP, practicing in the Chicago office located at 6600 Sears Tower, Chicago, Illinois 60606. Mr. Scholnick is a member in good standing of the Bars of the States of Illinois and California.

4. Mr. Jacob is associated with Schiff Hardin LLP, also practicing in the Chicago office. Mr. Jacob is a member in good standing of the Bar of Illinois.

5. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have annexed as Exhibit A a Certificate of Good Standing for Mr. Scholnick issued within the past thirty days by the Clerk of the Supreme Court of Illinois. I have annexed as Exhibit B a Certificate of Good Standing for Mr. Scholnick issued within the past thirty days by the Clerk of the Supreme Court of California. Annexed hereto as Exhibit C is an Affidavit by Mr. Scholnick, sworn to June 3, 2005. Defendants respectfully request that this affidavit be considered part of his application for admission *pro hac vice* in this case.

6. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have annexed as Exhibit D a Certificate of Good Standing for Mr. Jacob issued within the past thirty days by the Clerk of the Supreme Court of Illinois. Annexed hereto as Exhibit E is an Affidavit by Mr. Jacob, sworn to June 9, 2005. Defendants respectfully request that this affidavit be considered part of his application for admission *pro hac vice* in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 10, 2005

  
\_\_\_\_\_  
Donald A. Klein (DK7821)

NY\ 5038398.3

Donald A. Klein (DK7821)  
SCHIFF HARDIN LLP  
623 Fifth Avenue  
New York, New York 10022  
212-753-5000  
Attorneys for Defendants  
Schreiber & Zindel,  
Frank Zindel, Engelbert Schreiber,  
and Engelbert Schreiber, Jr.

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(S.D.N.Y.)*

**AFFIDAVIT OF AYAD P. JACOB**

STATE OF ILLINOIS )  
                      ) ss  
COUNTY OF COOK   )

Ayad P. Jacob, being duly sworn, deposes and says that the following facts are true and correct to the best of his personal knowledge:

1.     I am an attorney admitted to practice in the State of Illinois.
2.     I am an associate with the firm of Schiff Hardin LLP, and my office is located at 6600 Sears Tower, Chicago, Illinois 60606. My telephone number is (312) 258-5500.
3.     I make this affidavit in support of the motion of Donald A. Klein, of the law firm of Schiff Hardin LLP, for my admission pro hac vice to represent Defendants Schreiber &

Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants") in these matters.

4. I represent these Defendants in this litigation and am familiar with the case history.

5. I have been licensed to practice since November 1, 2003 (#6280274), and am in good standing, in the State of Illinois. I am also admitted to practice before the United States District Court for the Northern District of Illinois.

6. I am not under suspension or disbarment by any court.

7. I recognize that if I am admitted pro hac vice, I am within the disciplinary jurisdiction of the United States District Court for the Southern District of New York. Upon my admission pro hac vice, I agree to comply with all applicable New York Local Rules of Civil Procedure.

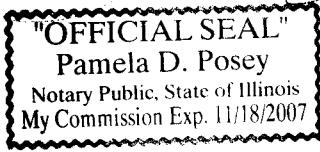


Ayad P. Jacob

Sworn to before me  
this 1<sup>st</sup> day of June, 2005



Notary Public



NY 5038402.1

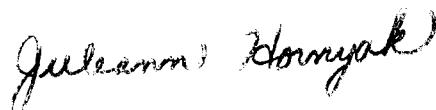
## Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

John Nathan Scholnick

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 5, 1979 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Monday, June 06, 2005.



Clerk



THE  
STATE BAR  
OF CALIFORNIA

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

May 27, 2005

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOHN N. SCHOLNICK was admitted to the practice of law in this state by the Supreme Court of California on October 8, 1980; that from the date of admission to August 9, 1996, he was an ACTIVE member of the State Bar of California; that on August 9, 1996, he transferred at his request to the INACTIVE status as of January 1, 1996; that on August 12, 1996, he was suspended from the practice of law in California by order of the Supreme Court for nonpayment of State Bar membership fees; that the suspension which commenced on August 12, 1996, ended on August 12, 1996; upon which last mentioned date he was reinstated by order of the Supreme Court upon payment of all delinquent State Bar fees and penalties; that from that date to September 27, 1999, he was an INACTIVE member of the State Bar of California; that on September 27, 1999, he was suspended from the practice of law in California by order of the Supreme Court for nonpayment of State Bar membership fees; that the suspension which commenced on September 27, 1999, remained in effect to December 22, 2000, upon which last mentioned date he was reinstated by order of the Supreme Court upon payment of all delinquent State Bar fees and penalties; that from that date to September 4, 2002, he was an INACTIVE member of the State Bar of California; that on September 4, 2002, he was suspended from the practice of law in California by order of the Supreme Court for nonpayment of State Bar membership fees; that the suspension which commenced on September 4, 2002, remained in effect to September 16, 2002, upon which last mentioned date he was reinstated by order of the Supreme Court upon payment of all delinquent State Bar fees and penalties; that from that date to April 14, 2003, he was an INACTIVE member of the State Bar of California; that on April 14, 2003, he transferred at his request to the ACTIVE status; that he has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Dina DiLoreto  
Custodian of Membership Records

Donald A. Klein (DK7821)  
SCHIFF HARDIN LLP  
623 Fifth Avenue  
New York, New York 10022  
212-753-5000  
Attorneys for Defendants  
Schreiber & Zindel,  
Frank Zindel, Engelbert Schreiber,  
and Engelbert Schreiber, Jr.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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(S.D.N.Y.)*

**AFFIDAVIT OF JOHN N. SCHOLNICK**

STATE OF ILLINOIS )  
                      ) ss  
COUNTY OF COOK   )

John N. Scholnick, being duly sworn, deposes and says that the following facts are true  
and correct to the best of his personal knowledge:

1.     I am an attorney admitted to practice in the States of Illinois and California.
2.     I am a member of the firm of Schiff Hardin LLP, and my office is located at 6600  
Sears Tower, Chicago, Illinois 60606. My telephone number is (312) 258-5500.
3.     I make this affidavit in support of the motion of Donald A. Klein, of the law firm  
of Schiff Hardin LLP, for my admission pro hac vice to represent Defendants Schreiber &

Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants") in these matters.

4. I represent these Defendants in this litigation and am familiar with the case history.

5. I have been licensed to practice since November 1, 1979 (#3125176), and am in good standing, in the State of Illinois. I have been licensed to practice since November 1, 1980 (#93270), and am in good standing, in the State of California. I am also admitted to practice before the United States Courts of Appeals for the Second, Third, Seventh, and Federal Circuits and the United States District Courts for the Northern and Central Districts of Illinois, the Eastern, Central and Southern Districts of California, the Eastern District of Michigan, and the Eastern District of Wisconsin.

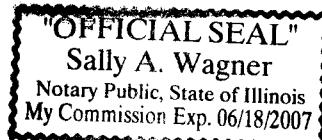
6. I am not under suspension or disbarment by any court.

7. I recognize that if I am admitted pro hac vice, I am within the disciplinary jurisdiction of the United States District Court for the Southern District of New York. Upon my admission pro hac vice, I agree to comply with all applicable New York Local Rules of Civil Procedure.

John N. Scholnick

Sworn to before me  
this 3rd day of June, 2005

Sally A. Wagner  
Notary Public



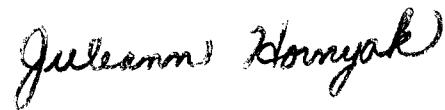
## Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Ayad Paul Jacob

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 2003 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Monday, June 06, 2005.



Clerk

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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(S.D.N.Y.)*

**AFFIDAVIT OF SERVICE**

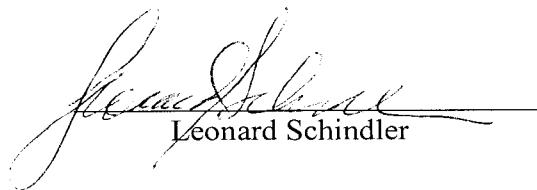
STATE OF NEW YORK

.ss

COUNTY OF NEW YORK

LEONARD SCHINDLER being duly sworn, deposes and says that he is over the age of eighteen years, is employed at 623 Fifth Avenue, New York, New York, and is not a party to the above entitled action.

That on the 10<sup>th</sup> day of June, 2005, he served the annexed Notice of Motion for Admission pro hac vice together with its supporting declaration and exhibits on all attorneys entitled to notice by e-mail pursuant to this Court's Case Management Order.



Leonard Schindler

Sworn to before me this  
13<sup>th</sup> day of June, 2005

  
JOEL MELTMAN  
NOTARY PUBLIC, State of New York  
No. 01EL6107315  
Qualified in New York County  
Commission Expires March 20, 2007  
Notary Public  
NY 5041178.1